### 16-5, KONAN 2-CHOME, MINATO-KU TOKYO, JAPAN

September 3, 2013

**Document Control Desk** U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

Attention: Mr. Perry Buckberg

Docket No. 52-021 MHI Ref: UAP-HF-13221

Subject:

Transmittal of the Technical Report "Onsite AC Power System

Calculation" (MUAP-09023, Revision 1)

- References: 1) MHI letter Ref. UAP-HF-10068, "Transmittal of the Technical Report MUAP-09023 "Onsite AC Power System Calculation", dated March 29,
  - 2) MHI letter Ref. UAP-HF-13052, "Transmittal of Technical Reports and DCD Mark-ups Related to the US-APWR Fukushima Evaluation", dated March 4, 2013.

With this letter, Mitsubishi Heavy Industries, Ltd. ("MHI") transmits to the U.S. Nuclear Regulatory Commission ("NRC") the technical report "Onsite AC Power System Calculation", MUAP-09023. Revision 1. The report is being submitted electronically on compact discs (CDs). The report was previously submitted in Reference 1. MHI is revising the technical report to update the calculation to reflect recent AC power system changes, such as those committed to in Reference 2.

As indicated in the enclosed materials, this report contains information that MHI considers proprietary, and therefore should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) as trade secrets and commercial or financial information which is privileged or confidential. Accordingly, the technical report is being submitted in two versions, on separate CDs. In the non-proprietary version of the report, the proprietary information, bracketed in the proprietary version, is redacted and replaced by the designation "[ ]".

This letter includes the proprietary version of technical report on CD 1 (Enclosure 2), the non-proprietary version of the technical report on CD 2 (Enclosure 3), and the Affidavit of Yoshiki Ogata (Enclosure 1) which identifies the reasons MHI respectfully requests that all materials designated as "Proprietary" in Enclosure 2 be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4).

Please contact Mr. Joseph Tapia, General Manager of Licensing Department, Mitsubishi Nuclear Energy Systems, Inc. if the NRC has questions concerning any aspect of this submittal. His contact information is provided below.

#### Sincerely,

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Yoshiki Ogata,

**Executive Vice President** 

Mitsubishi Nuclear Energy Systems, Inc.

Mitsubishi Heavy Industries, LTD.

#### **Enclosures:**

1. Affidavit of Yoshiki Ogata

2. CD 1: Onsite AC Power System Calculation, MUAP-09023 Revision 1, dated August 2013 (Proprietary version)

3. CD 2: Onsite AC Power System Calculation, MUAP-09023 Revision 1, dated August 2013 (Non-proprietary version)

The files contained on the CDs are listed in Attachment 1 hereto.

CC: P. Buckberg J. Tapia

#### **Contact Information**

Joseph Tapia, General Manager of Licensing Department Mitsubishi Nuclear Energy Systems, Inc. 1001 19th Street North, Suite 710 Arlington, VA 22209 E-mail: joseph\_tapia@mnes-us.com

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#### **Enclosure 1**

# MITSUBISHI HEAVY INDUSTRIES, LTD. AFFIDAVIT

- I, Yoshiki Ogata, state as follows:
- I am Executive Vice President of Mitsubishi Nuclear Energy Systems, Inc., and have been delegated the function of reviewing Mitsubishi Heavy Industries, LTD's ("MHI") US-APWR documentation to determine whether it contains information that should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4) as trade secrets and commercial or financial information which is privileged or confidential.
- 2. In accordance with my responsibilities, I have reviewed the enclosed document entitled "Onsite AC Power System Calculation", MUAP-09023 Revision 1, dated August 2013, and have determined that portions of the documents contain proprietary information that should be withheld from public disclosure. Those pages containing proprietary information are identified with the label "Proprietary" on the top of the page and the proprietary information has been bracketed with an open and closed bracket as shown here "[ ]". The first page of the document indicates that all information identified as "Proprietary" should be withheld from public disclosure pursuant to 10 C.F.R. § 2.390 (a)(4).
- 3. The information identified as proprietary in the enclosed document has in the past been, and will continue to be, held in confidence by MHI and its disclosure outside the company is limited to regulatory bodies, customers and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and is always subject to suitable measures to protect it from unauthorized use or disclosure.
- 4. The basis for holding the referenced information confidential is that it describes the unique design information and analysis methodology, developed by MHI and not used in the exact form by any of MHI's competitors. This information was developed at significant cost to MHI, since it required the performance of Research and Development and detailed design for its software and hardware extending over several years.
- 5. The referenced information is being furnished to the Nuclear Regulatory Commission ("NRC") in confidence and solely for the purpose of information to the NRC staff.
- 6. The referenced information is not available in public sources and could not be gathered readily from other publicly available information. Other than through the provisions in paragraph 3 above, MHI knows of no way the information could be lawfully acquired by organizations or individuals outside of MHI.
- 7. Public disclosure of the referenced information would assist competitors of MHI in their design of new nuclear power plants without incurring the costs or risks associated with the design of the subject systems. Therefore, disclosure of the information contained in the referenced document would have the following negative impacts on the competitive position of MHI in the U.S. nuclear plant market:

- A. Loss of competitive advantage due to the costs associated with development of the AC Power System. Providing public access to such information permits competitors to duplicate or mimic the technology without incurring the associated costs.
- B. Loss of competitive advantage of the US-APWR created by benefits of enhanced plant safety, and reduced operation and maintenance costs associated with the AC Power System.

I declare under penalty of perjury that the foregoing affidavit and the matters stated therein are true and correct to the best of my knowledge, information and belief.

Executed on this 3rd day of September, 2013.

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Yoshiki Ogata,

**Executive Vice President** 

Mitsubishi Nuclear Energy Systems, Inc.

## **ATTACHMENT 1**

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#### FILES CONTAINED IN CDs

CD 1:

Technical Report, MUAP-09023-P Revision 1, "Onsite AC Power System

Calculation" - Version Containing Proprietary

Contents of CD 1

File Name

<u>Size</u>

Sensitivity Level

MUAP-09023-P(R1).pdf

6,120KB

Proprietary

CD 2:

Technical Report, MUAP-09023-NP Revision 1, "Onsite AC Power System

Calculation" - Version Not Containing Proprietary

Contents of CD 2

File Name

Size

Sensitivity Level

MUAP-09023-NP(R1).pdf

316KB

Non-Proprietary